

Quality Document Status Memo

DATE	February 6, 2025		
SUBJECT	EPA Region 3 Review of Quality Assurance Document— Document Title: West Virginia Department of Environmental Protection; 2024 NPS Quality Assurance Project Plan; Standard Operating Procedures for Managing Nonpoint Source BMP Data EPA QA Document Control #: 240351 Document Date: 8/28/2024 Document Type: Quality Assurance Project Plan (QAPP) If other, specify: Click or tap here to enter text.		
FROM EPA Delegated Approving Official (DAO)	Name: Durga Ghosh Division: CBPO Phone; E-mail: dghosh@chesapeakebay.net	DAO Signature	
Additional Reviewer	<input type="checkbox"/> N/A Name: Auston Smith Division: CBPO Phone; E-mail: smith.auston@epa.gov	Additional Reviewer Signature	<i>David Auston Smith</i> 2/6/2025
CC	Kia Long Regional Quality Assurance Manager EPA Region 3, LSASD, ASQAB	THRU EPA Project Officer or equivalent	<input type="checkbox"/> N/A Name: James Hargett Division: CBPO
TO	Name: Samuel Canfield; Urban BMP Specialist Organization: West Virginia Department of Environmental Protection		

Thank you for submitting your quality assurance document for review. The status of your document is indicated on the following page, along with next steps and comments, if applicable. The document was reviewed for compliance to the requirements outlined in:

- ☐ EPA QA/R-2, EPA Requirements for QMPs [EPA/240/B-01/002, March 2001]
- ☐ EPA QA/R-5, EPA Requirements for QAPPs [EPA/240/B-01/003, March 2001]
- ☒ EPA Quality Assurance Project Plan Standard [CIO 2105-S-02.1, August 2023]
- ☐ Uniform Federal Policy (UFP) for QAPPs
[Intergovernmental Data Quality Task Force, Part 1: UFP-QAPP Manual, March 2005]
- ☐ Other: Click or tap here to enter text.

If you have any questions regarding this review, contact me, the delegated approving official, as listed above. For general Region 3 quality-related questions, email the Region 3 Quality Assurance cadre at R3_QA@epa.gov.

Note: This action represents EPA's determination that the document(s) under review comply with applicable requirements of the EPA Region 3 Quality Management Plan [<https://www.epa.gov/sites/production/files/2020-06/documents/r3qmp-final-r3-signatures-2020.pdf>] and other applicable requirements in EPA quality regulations and policies [<https://www.epa.gov/quality>]. This action does **not** represent EPA's verification of technical or programmatic accuracy or completeness of document(s) under review, and is **not** intended to constitute EPA direction of work by contractors, grantees or subgrantees, or other non-EPA parties.

Document Review Status

Document Status	Next Steps
<input checked="" type="checkbox"/> Approved <i>addressed key requirements satisfactorily.</i>	<ul style="list-style-type: none"> The document is valid for: <ul style="list-style-type: none"> <input type="checkbox"/> 5 years <input type="checkbox"/> Term of project, i.e., 1-2 years, up to 5 years <input checked="" type="checkbox"/> Other: To be reviewed annually; see general comments but should be reviewed annually, and if any significant changes to quality management or data collection practices, a resubmission is required of the revised document for review and subsequent approval.
<input type="checkbox"/> Conditionally Approved <i>satisfactorily addressed most key elements; however, minor deficiencies were noted, which do not affect quality of the data collected/used.</i>	<ul style="list-style-type: none"> Resubmit to EPA with changes completed and the document signed within: <ul style="list-style-type: none"> <input type="checkbox"/> 30 days, due by: Click or tap to enter a date. <input type="checkbox"/> Other: Click or tap here to enter text. Data collection may begin while these minor deficiencies are being resolved.
<input type="checkbox"/> Resubmittal Required <i>found to be deficient in describing key elements; further clarification of specific issues is required.</i>	<ul style="list-style-type: none"> Resubmit to EPA with changes completed and the document signed. Data collection may NOT occur until deficiencies are resolved, and an approved or conditionally approved EPA memo is issued.

Comments

☒ Not Applicable

General

- 2024 Update Comments:**
 - Page 15: Replace Alana Hartman's name with new PBC or interim coordinator if hiring is taking place.
 - Thank you, no further comments.
 - Page 19: Section title and others are not referenced in Table of Contents. Table of Contents is not reflective of the text- please review and update.
 - Thanks for noting difficulty doing this on marked version and appreciate seeing this on the clean version. No further comments.
 - Page 24: Please provide a link to the 'MAWP' and insert the full name into the document.
 - Thank you, no further comments.
 - Page 29: Under the definition for Forest Conservation, the following sentence is outdated and should be removed.
 - "Forest land use protected under conservation easement. *We realize the BMP guidance from Chesapeake Bay Program says only Maryland is eligible for this BMP at this time, but we still feel this BMP (with above definition) is worth tracking.*"
 - MD is not eligible for credit here as this BMP is superceded by the high-res land use that includes protected lands and forecasts that account for the impact of current policies. To avoid confusion. we think it might be helpful to remove this as it is not in the suite of materials submitted to NEIEN.
 - Thank you, no further comments.
 - Page 30: Please replace the broken link to CB Stormwater Performance Standards. We have provided a replacement for your review in the QAPP comment.
 - Thank you, no further comments.
 - Page 41: Why was an exception needed here for an alternate ratio for Pendleton County cover crop from .5 to .8?

- Thank you, no further comments.
- Page 42: Please remove the “late other wheat” portion of the sentence as it presented confusion to reviewers and is seen as unnecessary.
 - Thank you for your explanation, no further comments.
- Page 42: A few questions on Cover Crops and Commodity Cover Crops:
 - Please confirm that all data is coming from State cost assistance program and/or AEP program, and none from NRCS.
 - Please confirm if acreages are entered directly or is there some type of extrapolation method used.
 - Which cover crops are being reported? Traditional only or also traditional with fall nutrients applied?
 - If WV is using state data as a source, how is the acreage reported verified?
 - Is the acreage visually observed while staff is at the farm?
 - If WV is reporting cc w/fall nutrients, how is nutrient application observed?
 - Can you please discuss avoiding double counting given multiple programs submitting this data?
 - Thank you, no further comments.
 - Can you please provide a link or copied language from their data SOP detailing the QA/QC of this cover crop data?
 - Thank you, no further comments.
- Page 44: This is one example cited but please rephrase/alter language from a personal tone to aid in the longevity of these documents.
 - Thank you, no further comments.
- Page 45: Parentheses’ed phrase seems out of place, or please provide additional explanation.
 - Thank you, no further comments.
- Page 46: See comments above for Page 44.
 - Thank you no further comments.
- Page 47: Requested the list of NGO partners that provide the source data for future reference and also questioned whether they ask about joint efforts to ensure no double counting.
 - Thank you for flagging this list within the previous document, no further comments.
- Page 62: Flagged that wetland credit duration may need an update given amendment to credit duration.
 - Thank you, no further comments.
- Page 64: Flagged that wetland credit duration may need an update given amendment to credit duration.
 - Thank you, no further comments.
- Page 70: Flagged that wetland credit duration may need an update given amendment to credit duration.
 - Thank you, no further comments.
- Page 72/74/132: Comments have been left about D.1.9, previously D.1.1.9. Suggest removal as the staff qualifications are housed in other sections of the QAPP.
 - No adjustment needed, no further comments.
- Page 74: Are these practices not anticipated to be reported this year?
 - Thank you, no further comments.
- Page 131: Is the Veterans Administration Medical Center Tree Planting also to be included in this historical BMP update alongside the tables? Are there any expected acres for that submission?
 - Understood, thank you for the explanation. No further comments.
- **QAPP Update Email Comments:**
 - Thank you for updating this 2024 document to the new QAPP Standard format.
 - Page 1: Please update to include period of applicability and shift the effective date information.
 - Thank you for the adjustment. Regarding the effective date and period of applicability, please use the following:
 - Effective Date: September 2024 (submission month of this year)
 - Period of Applicability: July 1, 2023 – June 30, 2024 (date of information entered into

NEIEN)

- It looks like the wrong calendar year was placed here. Please revise to be July 1, 2023– June 30, 2024
 - Thank you, no further comments
- Page 1: Please adhere to the A.1 Template here- which includes effective date, period of applicability and DCN
 - Thank you, no further comments.
- Page 3 (clean): Please provide the two missing elements for Section A3, details below:
 - Suggested language for Document Format (*This Quality Assurance Project Plan (QAPP) was developed in accordance with the U.S. EPA Quality Assurance Project Plan Standard. The order of the elements in this QAPP follows the Standard, as seen in the Table of Contents. The QAPP is also in accordance with the U.S. EPA Region 3 Quality Management Plan, DCN R3QMP001-20200601*).
 - Table below shows the changes to this controlled document over time. The most recent version is presented in the top row of the table and includes details from Page 1 comment seen above, alongside changes made between submissions.
 - The middle column of “History/Changes” is a list of the changes made within the document since the last submission. “Original document” does not apply here. For the next version submitted, please input the adjustments requested in the memo for this iteration (likely includes just the effective date and cover crop insight per above highlighted comments)
 - Thank you, no further comments

Document Control Number	History/ Changes	Effective Date

- Page 7 (clean): Section A 6: This is a critical section and cannot be N/A. Please reference the appropriate sections in Appendix A pertaining to this content and provide a link to Appendix A in the revised document.
 - Other than A6, can you please append an “N/A” under sections with no relevant information?
 - Thank you, no further comments.
- Page 15: Sections A6 and A7 not included, Information/Data Quality Objectives and Performance/Acceptance Criteria and Distribution List respectively. Are these criteria elsewhere?
 - Thank you for the flag on the distribution list. See above comment on inclusion of “N/A” for this section A7.
 - Thank you, no further comments.
- General: See comment on Page 7 where other sections outlined in the QAPP Standard still need to be populated with information, references, or N/A’s as they are applicable.
 - Thank you, no further comments

Specific by Document Section

Document Section	Page #	EPA Comments
